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From: Jacob Odekirk
To: Meyer, Dan
Cc: Hardesty, Doug; Thomas Mosher; Kyle Heitkamp
Subject: RE: PotlatchDeltic Discussion
Date: Wednesday, December 16, 2020 2:38:32 PM
Attachments: ATT00001.txt
image003.png

Dan,

We do not intend to pursue modeling at this time in regards to the mNSR PM2.5 limits.

Thanks,

Jacob Odekirk
Environmental Manager | PotlatchDeltic
O: (208) 245-7503 | C: (208) 568-1009

From: Meyer, Dan <Meyer.Dan@epa.gov>
Sent: Wednesday, December 2, 2020 12:54 PM
To: Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>
Cc: Hardesty, Doug <Hardesty.Doug@epa.gov>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>; Kyle Heitkamp <kheitkamp@ramboll.com>
Subject: RE: PotlatchDeltic Discussion

[External Email] – Exercise caution with links and attachments.

All,

I called and spoke with Jacob this morning to provide notification that R10 is moving forward with plans to revise the PM2.5 emission factors and daily and annual limits in the LK-6 mNSR permit for PCWR-PM-SH and PCWR-PM-SD. Based upon 2020 RM201A source test results for BH-2 and BH-3, we now understand that PM2.5 actual emissions during the 2016-17 period for PCWR-PM-SH and PCWR-PM-SD are considerably less than estimated in PotlatchDeltic's application and R10's subsequent mNSR permit. Because of the unique approach in the AQIA to model the project's emissions increases and add those impacts to a background concentration (influenced by the facility and other sources in the area) and compare the sum with the NAAQS, allowable emissions are calculated by adding modeled emissions to pre-project actual emissions. It turns out that pre-project actual emissions for these two units are well less than what we collectively assumed them to be. The AQIA's background concentration does reflect PCWR-PM-SH and PCWR-PM-SD actual emissions, but we didn't get those actual emissions right in either the application or the permit. We need to fix that and revise the allowable emissions so that they are protective of the PM2.5 NAAQS. I recently became aware of the need to revise the emission limits for the two baghouses when thinking through the impact of using the new test-derived emission factors. I anticipate going through the same exercise when R10 receives test reports for PB-1 and PB-2.

Within the next week or two, R10 intends to share with PotlatchDeltic the revised mNSR permit and permit analysis. At that time, we'd like to meet with you and explain the materials. If you would like to meet before then, please let me know and we'll get together sooner.

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From: Meyer, Dan
Sent: Tuesday, December 01, 2020 1:07 PM
To: Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>
Cc: Hardesty, Doug <Hardesty.Doug@epa.gov>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>; Kyle Heitkamp <kheitkamp@ramboll.com>
Subject: RE: PotlatchDeltic Discussion

Jacob,

Got your email. Let me think through your input here and I'll get back to you ASAP.

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From: Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>
Sent: Monday, November 30, 2020 10:18 AM
To: Meyer, Dan <Meyer.Dan@epa.gov>
Cc: Hardesty, Doug <Hardesty.Doug@epa.gov>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>; Kyle Heitkamp <kheitkamp@ramboll.com>
Subject: RE: PotlatchDeltic Discussion

Dan,

Thank you for your work to revise the monitoring conditions in our Kiln 6 permit. PotlatchDeltic requested those revisions on March 11, 2020. We reported to our management that those revisions are complete and ready for reissuance, as you summarized in our recent call. We request that EPA complete that work and reissue the permit with the new monitoring conditions for our mill. At this time, we do not see any reason or benefit to revise our emissions limits, as you suggest in your November

23, 2020 email. Our recent test data confirms compliance with the current baghouse limits. In the future, if our business plans prompt future modifications of the source, then review of the permitted emissions limits may be appropriate. At this time we have no such business plans. Please reissue the permit with the revised monitoring conditions at your earliest convenience.

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From: Meyer, Dan <Meyer.Dan@epa.gov>
Sent: Monday, November 23, 2020 10:47 AM
To: Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>; Kyle Heitkamp <kheitkamp@ramboll.com>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>
Cc: Hardesty, Doug <Hardesty.Doug@epa.gov>
Subject: RE: PotlatchDeltic Discussion

[External Email] – Exercise caution with links and attachments.

Thank Jacob. How about we meet tomorrow, Tuesday? Doug and I are available after 10:30 am pacific. During the call, we'll explain the calculations in the attached workbook and the basis for revising the daily and annual limits for PCWR-PM-SH (BH-2) and PCWR-PM-SD (BH-3) as illustrated below given the 2020 source test results. I think no more than an hour is needed for the meeting. Let me know what time works best for you tomorrow after 10:30 am pacific, and I'll send out an MS Teams meeting invite. If some other day/time is preferable, let me know that too. Thanks.

3.9 Emissions shall not exceed the annual emission limits in Table 3-3. Unless otherwise required in this permit, compliance with these limits is determined by multiplying each emission factor in Table 3-3 (pounds per unit of operation) by the annual operation specified in Table 3-3, except as required in Condition 3.11.

Table 3-3 – Annual PM2.5 Emission Limits, tons per year

Emission Unit	Emission Limit	Emission Factor, units	Operation
LK-6	1.74	0.0510 lb/mbf lumber	Condition 4.2.2
PB-1	2.28	0.01488 lb/mlb steam	Condition 4.4.1
PB-2	3.10	0.00722 lb/mlb steam	Condition 4.4.1
PCWR-PM-SH	~~3.08~~1.01	~~0.8229~~0.00263 lb/~~hr~~mbf	Condition 4.5.4
PCWR-PM-SD	~~2.77~~0.90	~~0.7406~~0.00229 lb/~~hr~~mbf	Condition 4.5.4
PCWR-PM-PTB	0.62	0.1646 lb/hr	Condition 4.5.2
PCWR-PM-PSB	0.62	0.1646 lb/hr	Condition 4.5.1
PCWR-SM-SD	4.97	1.3280 lb/hr	Condition 4.5.3
PCWR-SM-SDB	1.09	0.2907 lb/hr	Condition 4.5.3
PCWR-SM-CH	4.09	1.0929 lb/hr	Condition 4.5.3
PT	2.52	0.8079 lb/hr	Condition 4.5.3

It is my impression that complying with the new PM2.5 limits for PCWR-PM-SD and PCWR-PM-SH will not be a problem for PotlatchDeltic as illustrated below:

PCWR-PM-SH

Effective daily planer throughput limit = (6.53 lb/day) * (mbf/0.00263 lb) = 2,483 mbf/day. During 2016-17, the highest daily planer throughput rate was 1,449 mbf/day. Effective annual planer throughput limit = (1.01 ton/yr) * (mbf/0.00263 lb) * (2000 lb/ton) = 768,061 mbf/yr. During 2016-17, the highest 12-month rolling total planer throughput was 210,776 mbf.

PCWR-PM-SD

Effective daily planer throughput limit = (5.77 lb/day) * (mbf/0.00229 lb) = 2,520 mbf/day. During 2016-17, the highest daily planer throughput rate was 1,449 mbf/day. Effective annual planer throughput limit = (0.90 ton/yr) * (mbf/0.00229 lb) * (2000 lb/ton) = 786,026 mbf/yr. During 2016-17, the highest 12-month rolling total planer throughput was 210,776 mbf.

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From: Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>
Sent: Friday, November 20, 2020 11:21 AM

To: Meyer, Dan <Meyer.Dan@epa.gov>
Cc: Kyle Heitkamp <kheitkamp@ramboll.com>; Hardesty, Doug <Hardesty.Doug@epa.gov>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>
Subject: RE: PotlatchDeltic Discussion

Yes, Monday or Tuesday would be best.

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From: Meyer, Dan <Meyer.Dan@epa.gov>
Sent: Friday, November 20, 2020 11:15 AM
To: Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>
Cc: Kyle Heitkamp <kheitkamp@ramboll.com>; Hardesty, Doug <Hardesty.Doug@epa.gov>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>; Shane Hammons <Shane.Hammons@PotlatchDeltic.com>; Bo Wilkins <bwilkins@bison-eng.com>
Subject: RE: PotlatchDeltic Discussion

[External Email] – Exercise caution with links and attachments.

Thanks Jacob. Let me get on this. During the call, Doug and I spoke of getting together with you again to explain next steps. That could happen as early as next week. Are you around next week?

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From: Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>
Sent: Friday, November 20, 2020 10:49 AM
To: Meyer, Dan <Meyer.Dan@epa.gov>
Cc: Kyle Heitkamp <kheitkamp@ramboll.com>; Hardesty, Doug <Hardesty.Doug@epa.gov>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>; Shane Hammons <Shane.Hammons@PotlatchDeltic.com>; Bo Wilkins <bwilkins@bison-eng.com>
Subject: RE: PotlatchDeltic Discussion

Dan,

Attached are the updated run sheets. I certainly had my doubts on whether Shane could locate these, but he was able to track down the data. “Input Boards” is lumber going into the planer.

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From: Meyer, Dan <Meyer.Dan@epa.gov>
Sent: Thursday, November 19, 2020 10:48 AM
To: Kyle Heitkamp <kheitkamp@ramboll.com>; Hardesty, Doug <Hardesty.Doug@epa.gov>; Jacob Odekirk <Jacob.Odekirk@PotlatchDeltic.com>; Thomas Mosher <Thomas.Mosher@PotlatchDeltic.com>; Shane Hammons <Shane.Hammons@PotlatchDeltic.com>; Bo Wilkins <bwilkins@bison-eng.com>
Subject: RE: PotlatchDeltic Discussion

[External Email] – Exercise caution with links and attachments.

Thanks everyone for attending today’s call. Based upon my understanding of the situation after knowledge gained during the call, R10 is requesting 03/17/20 planer throughput data for time periods highlighted in yellow.

EU: BH-2	Date: 03/17/20				
Run	RM201A Time Start/Finish Times	Port 1 Sampling Duration (min)	Port 1 Start/Finish Times (hr:min:sec)	Port 2 Sampling Duration (min)	Port 2 Start/Finish Times (hr:min:sec)
1	16:22 - 17:38	32.75	16:22:00 - 16:54:45	31.25	17:06:45 - 17:38:00
2	17:55 - 19:04	31.25	17:55:00 - 18:26:15	31.75	18:32:15 - 19:04:00
3	19:13 - 20:24	32.00	19:13:00 - 19:45:00	32.25	19:51:45 - 20:24:00
				For each run, we need volume (bf) of lumber entering the planer during these two time periods.	

EU: BH-3	Date: 03/17/20				
Run	RM201A Time Start/Finish Times	Port 1 Sampling Duration (min)	Port 1 Start/Finish Times (hr:min:sec)	Port 2 Sampling Duration (min)	Port 2 Start/Finish Times (hr:min:sec)
1	10:10 - 11:28	29.50	10:10:00 - 10:39:30	29.75	10:58:15 - 11:28:00
2	12:05 - 13:14	29.25	12:05:00 - 12:34:15	30.5	12:43:30 - 13:14:00
3	13:42 - 14:52	30.5	13:42:00 - 14:12:30	30.25	14:21:45 - 14:52:00
				For each run, we need volume (bf) of lumber entering the planer during these two time periods.	

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-----Original Appointment-----
From: Kyle Heitkamp <kheitkamp@ramboll.com>
Sent: Thursday, November 19, 2020 8:22 AM
To: Meyer, Dan; Hardesty, Doug; Jacob Odekirk (Jacob.Odekirk@PotlatchDeltic.com); Thomas Mosher; Shane Hammons; Bo Wilkins
Subject: PotlatchDeltic Discussion
When: Thursday, November 19, 2020 8:00 AM-8:30 AM (UTC-08:00) Pacific Time (US & Canada).
Where: Microsoft Teams Meeting

Microsoft Teams meeting

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